

JUN 2 9 2015

Nick Hastain, President Harris School of Business One Cherry Hill Suite 700 One Mall Drive Cherry Hill, NJ 08002-2983

Certified Mail Return Receipt Requested Domestic Return Receipt # 7006 2760 0002 1734 7648

RE: Final Program Review Determination

OPE ID: 02104000 PRCN: 200840226763

Dear Mr. Hastain:

The U.S. Department of Education's (Department's) School Participation Team – New York/Boston issued a program review report on June 27, 2012 covering Harris School of Business' (Harris) administration of programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2007/08 and 2008/09 award years. Harris' final response was received on November 9, 2012.

The School Participation Team – New York/Boston has reviewed Harris' responses to the Program Review Report. A copy of the program review report (and related attachments) and Harris' responses are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by Harris upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

Although the findings in the program review report identified serious concerns, this office has made a decision to close the review based on the length of time that has passed since the examination of those records, and Harris' assertions that it has taken corrective actions. As a result, Harris may consider the program review closed with no further action required. Harris is reminded that as a fiduciary, the institution must ensure that all program requirements are met and that all Title IV, HEA funds are properly spent.

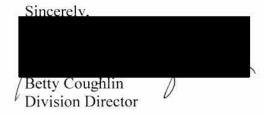


Harris School of Business OPE ID # 02104000 PRCN 200840226763 Page 2 of 2

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

If you have any questions please call Christopher Curry at (646) 428-3738.



Enclosure: Program Review Report (with attachments)

Harris School of Business' Response to the Program Review Report

cc: Michele Sinusas, Chief Information Officer

NJ Department of Education

NJ Department of Labor & Workforce Development

Accrediting Council for Independent Colleges and Schools (ACCSC)

Department of Defense

Department of Veterans Affairs

Consumer Financial Protection Bureau

APPENDIX A PROGRAM REVIEW REPORT



JUN 27 2012

Gary Camp, President Harris School of Business One Cherry Hill Suite 700 One Mall Drive Cherry Hill, NJ, 08002-2983

Certified Mail
Return Receipt Requested
Domestic Return Receipt
7006 2760 0002 1693 9783

RE:

Program Review Report

OPEID: 021040

PRCN: 200840226763

Dear Mr. Camp:

From September 3, 2008 through September 5, 2008, and then from September 23, 2008 through September 26, 2008, Christopher Curry and Judith Ortiz-Velazquez conducted a review of Harris School of Business' (Harris') administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by Harris. The response should include a brief, written narrative for each finding that clearly states Harris' position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, Harris must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report¹ and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination
 - a. A written statement addressing the institution's response;
 - b. A written statement of the basis for such report or determination; and
 - c. A copy of the institution's response.

Federal Student Aid, New York/Boston School Participation Division 32 Old Slip, 25th Floor, New York, NY 10005 www.FederalStudentAid.ed.gov

¹ A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

Harris School of Business OPE ID 02104000 PRCN 200840226763 Page 2 of 2

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written response will not be attached to the FPRD. However, it will be retained and available for inspection by Harris upon request. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The institution's response should be sent directly to Christopher Curry of this office within 60 calendar days of receipt of this letter, except for specific cases where additional time is identified.

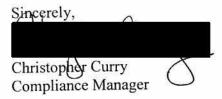
Protection of Personally Identifiable Information (PII):

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the attached report do not contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data / documents containing PII.

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact me at 646-428-3738 or Christopher.Curry@ed.gov.



cc: Michele Sinusas, Financial Aid Administrator

Enclosure:

Protection of Personally Identifiable Information

Prepared for



Harris School of Business

OPE ID 02104000 **PRCN** 200840226763

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Team – New York/Boston

Program Review Report

JUN 27 2012

Harris School of Business OPE ID 02104000 PRCN 200840226763 Page 1

Table of Contents

Table of Contents

		rage
A.	Institutional Information.	2
В.	Scope of Review	3
C.	Findings	3
	Finding #1. Conflicting or Missing Information	4
	Finding #2. Incomplete Verification	
	Finding #3: Program Hours Not Offered	
	Finding #4 Inadequate Monitoring of Student Attendance	
	Finding #5: Incorrect Calculation of Return to Title IV (R2T4)	
	Finding #6. Inadequate Document of Need Calculations for Direct Loan	
	Finding #7. Inaccurate Loan Certification	
	Finding #8. Failure to Document Refunds to Title IV Programs	
	Finding #9: Misrepresentation	
D. A	Appendices	26
Appo	endix A: Student Sample	26

Harris School of Business OPE ID 02104000 PRCN 200840226763 Page 2

A. Institutional Information

Harris School of Business One Cherry Hill Suite 700 One Mall Drive Cherry Hill, NJ 08002-2983

Type: Proprietary

Highest Level of Offering: Non-Degree 1 Year (900-1799 hours)

Accrediting Agency: Accrediting Council for Independent Colleges and Schools

(ACICS)

Current Student Enrollment: 1149

% of Students Receiving Title IV: 85%

Title IV Participation: Source – Postsecondary Educational Participants System (PEPS)

2010/11

Federal Pell Grant Program (Pell) \$4,571,935

William D Ford Federal Direct Loan Program (FDL) \$6,803,058

Federal Supplemental Education Opportunity Grant(SEOG) \$121,025

Default Rate FFEL/DL:

2009 15.5%

2008 16.1%

2007 13.5%